

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Jiangsu Huari Webbing  
Leather Co., Ltd.

Plaintiff

v.

Joes Identified in  
Schedule "A"

Defendants.

)  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)

Case No. 23-cv-2605

**DECLARATION OF JIYUAN ZHANG**

I, Jiyuan Zhang, hereby declare as follows:

1. I am an attorney with the law firm of J. Zhang & Associates, P.C. located at 136-20 38th Avenue, Ste 11G, Flushing, NY 11354 and represents Jiangsu Huari Webbing Leather Co., Ltd in the above-referenced action. I make and submit this declaration in connection with Plaintiff's Complaint.

2. If Defendants receive notice of this Lawsuit, it is highly likely that they will transfer, conceal and/or destroy 1) the Hanging Exercise Products, 2) the means of making or obtaining the Hanging Exercise Products, 3) business records, 4) any and all other evidence relating to their infringing activities, and (5) they will likely hide or dispose of their assets.

3. Many defendants, if not all, have obfuscated their physical location on their respective Amazon storefronts. It is believed that many are in China because addresses provided on the e-commerce stores indicate that the registrants are in China and other neighboring countries, and often Chinese characters appear in the individual owner names and addresses. Many of these addresses are inherently unreliable.

4. After being retained by the Plaintiff, I coordinated and supervised the efforts to research and identify the individual defendants. I also coordinated and supervised the efforts to provide a jurisdictional basis for this Court to hear this case.

5. This effort included (1) completing a checkout page for an order of Infringing Products from every Defendant through an account associated with an address in New York City, and/ or 2) purchasing an Infringing Product for delivery to the same address; and 3) verifying that the purchased items were indeed shipped to the same address. Attached **Exhibit D001 to D162** are true and accurate copies in relation to each named defendant, with each exhibit number matching the defendant number identified in Schedule "A" attached to the complaint.

6. Attached as **Exhibit B** is an infringement evidence chart, which shows the relevant portions of each of the aforementioned websites from each defendant. The chart serves as evidence supporting the alleged patent infringement.

I declare that the foregoing is true.

Dated: March 27, 2023

Queens, New York

*/s/ Jiyuan Zhang*

---

Jiyuan Zhang